



463201

**Winnebago Landfill
Northern and Southern Units
Winnebago County, Illinois**

**Permit Number: 1991-138-LF
Site Number: 2018080001**

Alternate Source Demonstration

April 2011



Submitted to:
Illinois Environmental Protection Agency
Bureau of Land
Springfield, Illinois

Prepared for:
Winnebago Landfill
8403 Lindenwood Road
Rockford, Illinois



Prepared by:

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April 8, 2011

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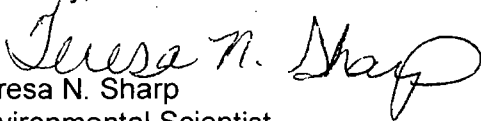
Re: 2018080001 – Winnebago County
Winnebago Landfill – Northern and Southern Units
Alternate Source Demonstration

Dear Mr. Nightingale:

On behalf of our client, Winnebago Landfill, submitted herein are an original and three copies of an alternate source demonstration in accordance with Condition VIII.15 of Permit No. 1991-138-LF Modification 46. Application forms (LPC-PA1 and Certification of Authenticity) are provided in Appendix A of the application.

Please contact Tom Hilbert at (815) 963-7516 if you have any questions or require additional information.

Sincerely,


Teresa N. Sharp
Environmental Scientist

TNS:bjh:slm

Enclosure(s)

cc: Tom Hilbert – William Charles Waste Companies
Bernie Shorle – US EPA Region 5

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1. INTRODUCTION

Condition No. VIII.15 of Permit No. 1991-138-LF Modification No. 46 requires that an alternate source demonstration be conducted for all confirmed monitored increases detected in facility monitoring wells or that an assessment monitoring program be implemented to determine whether the facility is the source of the increases. Exceedences that were observed fourth quarter 2010 were sampled for confirmation during the first quarter 2011 event. This application provides an alternate source demonstration for the fourth quarter 2010 confirmed exceedences. The application forms (Certification of Authenticity and LPC-PA1) are contained in Appendix A.

2. BACKGROUND INFORMATION

2.1 Site Description

The Winnebago Landfill facility contains three separate disposal areas (Northern and Southern Units, and the North Expansion Unit) authorized under Illinois EPA Permit Nos. 1991-138-LF and 2006-221-LF, respectively. A site map has been provided as Figure 1. The Northern Unit ceased accepting waste on September 8, 2000. The Southern Unit continues to operate in accordance with the current permit. In addition, a North Expansion Unit, located between the existing Northern Unit and Baxter Road, began operation under Illinois Permit No. 2006-221-LF on May 16, 2008. This unit is also shown in Figure 1.

2.2 Site Hydrogeological Summary

The site hydrogeologic characteristics have been accurately determined based on implementation of a series of subsurface investigations, beginning with the initial drilling investigation in 1969 by Testing Engineers, Inc. Subsequent investigations have included advancement of borings, well/piezometer installations for the existing site and facility expansion, and comprehensive groundwater quality testing due to releases by Acme Solvents. Additional hydrogeologic information has been gained due to development activities of the North Expansion Unit, which includes excavation of materials exposing bedrock and unconsolidated deposits.

2.2.1 Unconsolidated Deposits

The composition of the unconsolidated deposits, which appear to be glacial outwash, varies with location throughout the facility boundaries. Coarse-grained sand and gravel with occasional silt and/or clay seams typically underlie the Northern Unit. The thickness of the sand and gravel varies from just a few feet beneath the east toe of the waste footprint to approximately 70 feet beneath the western edge of the waste boundary. The sand and gravel thickens to the west, corresponding with the erosion of the underlying dolomite. Unconsolidated sand and gravel glacial drift sediments directly underlay the western portion of the Northern Unit, while fractured dolomite bedrock underlies the eastern portion of the landfill.

2.2.2 Bedrock

The bedrock consists of dolomite, fractured and weathered to varying extents. Chert layers, chert nodules, and small vugs were commonly noted on boring logs. However, larger voids or karst characteristics were not indicated on the boring logs. The bedrock surface is highly variable throughout the facility. East of the site a dolomite bedrock upland is present and outcrops in the vicinity of the Acme Solvent site and two quarries. This bedrock upland

represents the eastern bedrock escarpment of the Upper Rock buried valley. The site is situated on the eastern edge of the Upper Rock buried bedrock valley. The overburden thickens as the elevation of the bedrock surface decreases to the west. As determined by previous boring investigations, and monitor well and gas probe installations, the bedrock varies from a high near 750 feet above mean sea level (MSL) at the southeast corner of the North Unit to a low of approximately 675 feet above MSL to the west and south of the South Unit.

2.2.3 Uppermost Aquifer

The uppermost aquifer for the site is located within the glaciofluvial sand and gravel deposits and the upper portion of the fractured dolomite bedrock. The saturated sands and gravels, which directly overlie the bedrock, occur in the western two-thirds of the Northern Unit. In locations where there are no saturated glaciofluvial deposits, the uppermost aquifer is located within the dolomite bedrock typically overlain by silty clay deposits. This occurs in the eastern third of the Northern Unit.

2.2.4 Groundwater Flow Conditions

The general flow direction within the uppermost aquifer is westward and downward in the bedrock upland east of the site. However, groundwater may flow upward from the bedrock to the unconsolidated sediments in areas where sediments are saturated (HSI GeoTrans, 1995). This is due to the higher permeability of the sand and gravel deposits. Groundwater flow in the unconsolidated sediments is to the west-northwest. Potentiometric surface maps provided in Appendix B indicate groundwater movement is generally west-northwest beneath the Northern Unit. Groundwater elevations obtained from recent monitor wells and piezometers installed west of Killbuck Creek indicate flow is to the north west of Killbuck Creek. Shallow groundwater may discharge to Killbuck Creek while groundwater in the lower part of the unconsolidated sediments and deeper bedrock flows beneath Killbuck Creek.

Killbuck creek is both a gaining and losing stream dependent upon hydrogeologic and atmospheric conditions. During drier periods where the water table drops below the bottom of the creek bed, surface waters feed the groundwater system. During wetter periods where the water table is high (above the bottom of the creek bed) the groundwater system will recharge the stream and wetlands. This fluctuation allows mixing of surface water (and, therefore, surface water constituents) with groundwater (and any groundwater constituents) often on a seasonal basis. In addition, dependent upon the creek stage, the surface waters of both the creek and the wetland mitigation area may be contiguous.

The aquifer system beneath the facility, which includes both the saturated sand and gravel and the upper weathered/fractured part of the dolomite, extends to an approximate depth of 665 feet MSL. East of the landfill and beneath the eastern quarter of the Northern Unit, the water table occurs within the dolomite bedrock. Beneath the western three-fourths of the site and within the Killbuck Creek Valley, the water table occurs within the sand and gravel deposits. Previous hydrogeologic investigations and evaluations have shown that vertical gradients do exist within the uppermost aquifer but are typically slight at any individual location. Therefore, groundwater elevations from the bedrock wells and wells screened in the unconsolidated materials (sand and gravel) were used to create one potentiometric surface for each quarterly sampling period. As expected, the hydraulic gradients are greater at the east end of the facility where the bedrock is higher and flat near Killbuck Creek.

3. GROUNDWATER QUALITY

In accordance with 35 Ill. Adm. Code 811.319 and the current permit, the groundwater quality is evaluated on a quarterly basis. Results of the statistical evaluations are reported quarterly in accordance with Condition No. VIII.18. Notification of observed increases/confirmed increases have been submitted in accordance with Condition No. VIII.14 of the permit.

3.1 Existing Monitor Well Network

The facility has an extensive network of monitoring wells from which groundwater data are obtained. Separate monitor well networks exist for the Northern and Southern Units. The Northern Unit contains 23 groundwater monitoring points, of which five are designated as background groundwater quality wells (upgradient), one is a compliance boundary well at the edge of the zone of attenuation and the remaining wells monitor within the zone of attenuation downgradient and sidegradient of the landfill. Winnebago Landfill samples 10 additional wells on a quarterly basis as part of the GMZ monitoring network. Six temporary monitoring wells were installed and sampled from October to December 2009 to monitor the groundwater quality west of the permitted GMZ area. Each of the wells is identified in Figure 1. The following table provides a list of the monitoring wells for the Northern Unit.

Northern Unit Detection Monitoring Wells (23)	
Upgradient	G09D, G09M, G13S, G13D, G20D
Compliance Boundary	R39S
Zone of Attenuation	G03M, G16M, G17S, G18D, G18S, G33D, G34D, G35D, G36S
	G37S, G38S, G40S, G41D, G41M, G41S, R42S, G51S
Northern Unit GMZ Only Wells (10)	
Compliance Boundary	G52S, G52M
Zone of Attenuation	R03S, G16D, G33S, G34S, G35S, G37D, G130, G50S
Northern Unit Temporary Wells (6)	
Zone of Attenuation	T1U-A, T1L-A, T2U-A, T2L-A, T3U-A, T3L-A

The Southern Unit contains 17 permitted groundwater monitoring points. Six are designated as background groundwater quality wells (upgradient); two (G13S and G13D) are also background wells for the Northern Unit. Although, monitoring wells R05S, G29S, and G29D are permitted as zone of attenuation wells, based on the potentiometric surface maps (Appendix B), these wells are also located upgradient to the waste units. The wells have been used previously in the derivation of the background/applicable groundwater quality standards (AGQS) values for the unit. The following table lists the monitoring wells for the Southern Unit.

Southern Unit Detection Monitoring Wells (17)	
Upgradient	R11S, G11D, G13S, G13D, R22S, G22D
Zone of Attenuation	R05S, G23D, R24D, R25D, R27D, R28D, G29S, G29D, G26S, G26D, G49D

3.2 Background Concentrations

The initial background concentrations (AGQSS) for the Northern Unit were determined from data obtained from four wells located east of Lindenwood Road on the Acme Solvent property (B-8, STI-2S, STI-2I, and STI-2D). Background sampling occurred during 1990 through 1992. The

AGQSs were proposed in the initial significant modification application and subsequent addendums. Addendum 3 to the initial significant modification, dated February 10, 1993, provided the first full listing of routine AGQS values derived from wells G09M, G09D, G13S, and G13D. Since the time the background concentrations were obtained, remediation at the Acme Solvent facility ceased and an additional quarry began operation east of Acme Solvents (the facilities are located upgradient to the landfill). The approximate location of Acme Solvents and the quarries are shown in Figure 2. These activities have likely affected the current background conditions. To account for changes in the background groundwater quality since 1993, revised AGQS values for 60 G1 and G2 List parameters were submitted and subsequently approved on March 26, 2004 with the issuance of Modification 24 to the current permit.

The initial AGQSs for the Southern Unit were determined from data obtained from the permitted upgradient/background wells. However, revisions to several background values have included data from wells R05S, G29S, and G29D as part of the statistical derivation. Although permitted as zone of attenuation wells, these wells are actually hydraulically upgradient to the Southern Unit and provide additional information on the background groundwater quality. As mentioned in Section 3.1 above, monitor wells G13S and G13D are contained in the monitor well networks for both the Northern and Southern Units. The groundwater quality for these two wells along with R05S (Southern Unit) and G16D (Northern Unit) are not evaluated with respect to the permitted AGQSs but are reviewed based on trend analyses in accordance with Condition VIII.25 of Permit No. 1991-138-LF (Modification No. 46).

3.3 Confirmed Increases

The table below lists the parameters and wells that have been confirmed to exceed the criteria listed in Condition VIII.13 during the fourth quarter 2010 confirmed sampling event at Winnebago Landfill. The historical sampling results for each of the exceeding wells/parameters are provided as Table 1 and Table 2 for the Northern and Southern Units, respectively. Each confirmed increase is discussed in detail in the sections below. In addition, graphical trend analyses have also been conducted for each of the confirmed exceedences and are provided in Appendix C.

Unit	Well	Location	Confirmed Increases
North	R03S	Downgradient	cis-1,2-dichloroethene
North	G09M	Upgradient	benzene, chlorobenzene
North	R39S	Compliance	cis-1,2-dichloroethene
North	G51S	Downgradient	1,2-dichlorobenzene, cis-1,2-dichloroethene
South	R11S	Upgradient	cis-1,2-dichloroethene
South	R22S	Upgradient	specific conductance
South	R28D	Downgradient	acetone, carbon disulfide

3.3.1 1,2-dichlorobenzene

The fourth quarter 2010 concentration (2 ug/l) of 1,2-dichlorobenzene exceeded the preceding second quarter 2010 concentration (<1 ug/l) at well G51S, and was confirmed first quarter 2011 (1.8 ug/l). However, the detected concentrations were well below the AGQS value (5 ug/L). The parameter 1,2-dichlorobenzene is a chlorinated solvent that is likely associated with the Acme Solvents facility located directly upgradient of Winnebago Landfill. 1,2-dichlorobenzene has also been detected historically at upgradient well G09D (during the 2003, 2004, 2005, 2006, and 2009 second quarter events), which is located between Acme Solvents and the landfill. The

offsite source is affecting the concentrations in both up- and downgradient wells at the landfill facility. The historical detections of 1,2-dichlorobenzene at G09D have been addressed as part of pending Application Log No. 2010-373 (alternate source demonstration). Since concentrations remain below the AGQS value, no further action is necessary for this parameter.

3.3.2 Acetone

The fourth quarter 2010 concentration (5.1 ug/l) of acetone minimally exceeded the preceding second quarter 2010 concentration (<5 ug/l) at well R28D. However, the monitoring well was unable to be sampled during first quarter 2011 for confirmation. Historically, acetone has never been detected at R28D. During the fourth quarter 2010 sampling event, acetone was also detected in upgradient well G13D (8.6 ug/l), the field blank (65 ug/l), and equipment blank (58 ug/l) indicating the detections are not representative of a leachate impact, but likely due to laboratory/sampling contamination. A copy of the laboratory field/equipment blank analytical is provided in Appendix D. The detections of acetone at well R28D are due to laboratory/sampling contamination; therefore no further action is necessary for this parameter.

3.3.3 Benzene

The fourth quarter 2010 concentration (2.2 ug/l) of benzene exceeded the preceding second quarter 2010 concentration (<1 ug/l) at upgradient well G09M, and was confirmed first quarter 2011 (2.3 ug/l). The detected concentrations are below the AGQS/MAPC value (2.8 ug/L). Since well G09M is located upgradient of the landfill and concentrations are below the AGQS/MAPC value, no further action is necessary for this parameter.

3.3.4 Carbon disulfide

The fourth quarter 2010 concentration (3.5 ug/l) of carbon disulfide exceeded the preceding second quarter 2010 concentration (<1 ug/l) at well R28D. As mentioned above, first quarter 2011 results from well R28D are not available for confirmation. Historically, carbon disulfide has never been detected at R28D. During the fourth quarter 2010 sampling event, carbon disulfide was also detected in fifteen other samples. All wells with observed detections were sampled for confirmation (with the exception of R28D) during first quarter 2011. The confirmation results did not confirm the detection of carbon disulfide in any well. The lack of confirmation for the detections observed in the monitoring wells indicates that the fourth quarter 2010 detection of carbon disulfide in well R28D is likely due to laboratory/sampling error. Therefore, no further action is necessary for this parameter.

3.3.5 Chlorobenzene

The fourth quarter 2010 concentration (5.9 ug/l) of chlorobenzene exceeded the AGQS value (5 ug/L) at upgradient well G09M, and was confirmed first quarter 2011 (5.7 ug/l). Along with G09M, chlorobenzene has also been detected historically at upgradient wells G09D, G13D, and G13S. Detections of chlorobenzene at upgradient wells G09D, G13D, and G13S have previously been discussed as part of pending Application Log No. 2010-373. These upgradient wells are located between Acme Solvents and the landfill. Chlorobenzene is an industrial solvent associated with the Acme Solvents; its presence in upgradient groundwater indicates it is attributable to the Acme Solvents facility and not the landfill. Therefore no further action is necessary for this parameter.

A complete reevaluation of the background groundwater quality for the Northern Unit has been proposed as part of pending application Log No. 2010-038 (GMZ investigation report). Concentrations of chlorobenzene will be reevaluated at that time and a revised AGQS will likely be proposed to account for the upgradient concentrations of the parameter. Exceedences of chlorobenzene will continue to be reported to the Illinois EPA in accordance with Condition VIII.14 of the permit; however, any additional assessment (i.e., alternate source demonstrations/assessment monitoring required by Condition VIII.15) will be conducted as part of the background reevaluation.

3.3.6 *Cis-1,2-dichloroethene*

The fourth quarter 2010 concentration of cis-1,2-dichloroethene exceeded the preceding second quarter 2010 concentration at Northern Unit wells R03S, R39S, and G51S, and Southern Unit upgradient well R11S. First quarter 2011 concentrations confirmed the increase in all four wells. However, the increased concentrations, which range from 1.1 ug/l to 1.9 ug/l, are well below the AGQS value (5 ug/l). Cis-1,2-dichloroethene is a chlorinated solvent which has historically been detected in many of the upgradient wells (G09M, G11D, R11S, G13D, G13S, and G20D), including fourth quarter 2010 (G11D, R11S, G13S, and G20D), with the highest concentration (11 ug/l) recorded at G20D. Upgradient well G20D is the closest well to the Acme Solvents property. The concentrations detected in downgradient wells R03S, R39S, and G51S appear directly related to concentrations detected in the upgradient wells. The presence of cis-1,2-dichloroethene in the upgradient groundwater indicates it is attributable to the Acme Solvents facility and not the landfill. Therefore no further action is warranted for this parameter.

3.3.7 *Specific conductance*

Specific conductance at upgradient well R22S exceeded the AGQS value (2,030 umhos/cm) during fourth quarter 2010 (3,210 umhos/cm) and was confirmed first quarter 2011 (3,330 umhos/cm). As shown by the graph in Appendix C, the overall trend for specific conductance at R22S is sporadic. Historically, specific conductance first exceeded the AGQS value during third quarter 2001, prior to waste placement in the Southern Unit (first quarter 2002 for Cell 3). This along with the upgradient position of the well, indicates that the elevated specific conductance concentrations are not related to waste disposal activities but to spatial variability. As discussed in previous applications (including recent Log Nos. 2007-012, 2008-070, and 2010-152), R22S monitors a lithologic setting significantly different from the rest of the Southern Unit wells. Well R22S screens a silty lens within a clay wedge while all other Southern Unit wells screen aerially extensive sand and gravel deposits. To account for the spatial variability at this location, an intrawell AGQS value of 3,330 umhos/cm is proposed for specific conductance at R22S. The statistical method and intrawell calculations are provided in Appendix E and Appendix F, respectively.

4. RECOMMENDATIONS AND CONCLUSIONS

Based on an evaluation of the historic sampling results, trend analyses, groundwater flow direction, and background information, the confirmed increases are not associated with the landfill but appear to be related to upgradient groundwater quality, temporal/spatial variability, and laboratory/sampling contamination. An intrawell value has been proposed (3,300 umhos/cm) for specific conductance at R22S to address the spatial variability of the screened interval. No further action or assessment is required for any of the remaining subject

parameters. This alternate source demonstration fulfills the requirements of Condition No. VIII.15 of Permit No. 1991-138-LF Modification No. 46.

TABLES

Table 1
Winnebago Landfill - Northern Unit Analytical

Well ID	Parameter	Units	GW List	AGQS	2ndQtr97	2ndQtr98	2ndQtr99	2ndQtr00	2ndQtr01	2ndQtr02	2ndQtr03	2ndQtr03re	2ndQtr04
G51S	1,2-Dichlorobenzene	ug/l	G2	5									
G09M	Benzene	ug/l	G2	2.8	< 2	< 2	< 1	< 1	< 1	< 1	< 1		< 1
G09M	Chlorobenzene	ug/l	G2	5	< 5	< 5	< 1	< 1	< 1	< 1	< 1		< 1
G51S	cis-1,2-Dichloroethene	ug/l	G2	5									
R03S	cis-1,2-Dichloroethene	ug/l	G2	5	< 5	< 5	2.7	< 1	< 1	< 1	2	1	1
R39S	cis-1,2-Dichloroethene	ug/l	G2	5									

Well ID	Parameter	Units	GW List	AGQS	2ndQtr05	2ndQtr06	2ndQtr06re	2ndQtr07	2ndQtr07re	2ndQtr08	4thQtr08	1stQtr09	2ndQtr09
G51S	1,2-Dichlorobenzene	ug/l	G2	5									< 1
G09M	Benzene	ug/l	G2	2.8	< 1	< 1		< 1		1	< 1		< 1
G09M	Chlorobenzene	ug/l	G2	5	1	2	< 1	2		3	2.2		< 1
G51S	cis-1,2-Dichloroethene	ug/l	G2	5									< 1
R03S	cis-1,2-Dichloroethene	ug/l	G2	5	3	2		3	< 1	1	2	1.6	1.6
R39S	cis-1,2-Dichloroethene	ug/l	G2	5									< 1

Well ID	Parameter	Units	GW List	AGQS	4thQtr09	2ndQtr10	4thQtr10	1stQtr11
G51S	1,2-Dichlorobenzene	ug/l	G2	5	< 1	< 1	2	1.8
G09M	Benzene	ug/l	G2	2.8	< 1	< 1	2.2	2.3
G09M	Chlorobenzene	ug/l	G2	5	1.4	< 1	5.9	5.7
G51S	cis-1,2-Dichloroethene	ug/l	G2	5	< 1	< 1	1.9	1.2
R03S	cis-1,2-Dichloroethene	ug/l	G2	5	1.5	< 1	1.5	1.1
R39S	cis-1,2-Dichloroethene	ug/l	G2	5	< 1	< 1	1.2	1.4

Note:

A highlighted cell indicates an exceedence of the AGQS/MAPC value.
Andrews Engineering, Inc.

Table 2
Winnebago Landfill -Southern Unit Analytical

Well ID	Parameter	Units	GW List	AGQS	2ndQtr98	1stQtr99	2ndQtr99	3rdQtr99	4thQtr99	1stQtr00	2ndQtr00	3rdQtr00	4thQtr00
R22S	Specific Conductance (field)	umhos	G1	2029.99		1220	1290	1430	1849	132	2008	792	1482
R28D	Acetone	ug/l	G2	100			< 5				< 5		
R28D	Carbon disulfide	ug/l	G2	5			< 1				< 1		
R11S	cis-1,2-Dichloroethene	ug/l	G2	5	< 5		8.6				10		

Well ID	Parameter	Units	GW List	AGQS	1stQtr01	2ndQtr01	3rdQtr01	4thQtr01	1stQtr02	2ndQtr02	3rdQtr02	4thQtr02	1stQtr03
R22S	Specific Conductance (field)	umhos	G1	2029.99	1542	1332	2780	620	1140	950	1230	1230	1290
R28D	Acetone	ug/l	G2	100		< 5				< 10			
R28D	Carbon disulfide	ug/l	G2	5		< 1				< 1			
R11S	cis-1,2-Dichloroethene	ug/l	G2	5		6.1				6			

Well ID	Parameter	Units	GW List	AGQS	2ndQtr03	2ndQtr03re	3rdQtr03	4thQtr03	1stQtr04	2ndQtr04	2ndQtr04re	3rdQtr04	3rdQtr04re
R22S	Specific Conductance (field)	umhos	G1	2029.99	1190		1290	1140	1470	1360	1720	1680	1640
R28D	Acetone	ug/l	G2	100	< 10					< 10			
R28D	Carbon disulfide	ug/l	G2	5	< 1					< 1			
R11S	cis-1,2-Dichloroethene	ug/l	G2	5	6	6	5	4	4	5		7	

Well ID	Parameter	Units	GW List	AGQS	4thQtr04	1stQtr05	1stQtr05re	2ndQtr05	3rdQtr05	3rdQtr05re	4thQtr05	4thQtr05re	1stQtr06
R22S	Specific Conductance (field)	umhos	G1	2029.99	1300	970	1860	1450	1960	1910	1366	1572	1055
R28D	Acetone	ug/l	G2	100				< 10					
R28D	Carbon disulfide	ug/l	G2	5				< 1					
R11S	cis-1,2-Dichloroethene	ug/l	G2	5				5					

Well ID	Parameter	Units	GW List	AGQS	1stQtr06re	2ndQtr06	3rdQtr06	3rdQtr06re	4thQtr06	1stQtr07	1stQtr07re	2ndQtr07	2ndQtr07re
R22S	Specific Conductance (field)	umhos	G1	2029.99	1313	1778	1610	1650	1046	1984	1735	1422	
R28D	Acetone	ug/l	G2	100		< 10						X* 10	
R28D	Carbon disulfide	ug/l	G2	5		< 1						X* 1	
R11S	cis-1,2-Dichloroethene	ug/l	G2	5		< 1						5	4

Well ID	Parameter	Units	GW List	AGQS	3rdQtr07	4thQtr07	4thQtr07re	1stQtr08	1stQtr08re	2ndQtr08	3rdQtr08	4thQtr08	1stQtr09
R22S	Specific Conductance (field)	umhos	G1	2029.99	992	1485	1782	2565	1235	564	810	715	1747
R28D	Acetone	ug/l	G2	100						< 10		< 10	
R28D	Carbon disulfide	ug/l	G2	5						< 1		< 1	
R11S	cis-1,2-Dichloroethene	ug/l	G2	5						3		2.8	

Well ID	Parameter	Units	GW List	AGQS	2ndQtr09	3rdQtr09	4thQtr09	1stQtr10	2ndQtr10	3rdQtr10	4thQtr10	1stQtr11
R22S	Specific Conductance (field)	umhos	G1	2029.99	2710	749	938	1571	3200	1209	3210	3330
R28D	Acetone	ug/l	G2	100	< 5		< 5		< 5		5.1	
R28D	Carbon disulfide	ug/l	G2	5	< 1		< 1		< 1		3.5	
R11S	cis-1,2-Dichloroethene	ug/l	G2	5	2.8		1.6		1.3		1.8	1.8

Note:
A highlighted cell indicates an exceedence of the AGQS/MAPC value.
Andrews Engineering, Inc.

FIGURES

DATE: DECEMBER 2010 PROJECT ID: 90-114 SHEET NUMBER:	SITE MAP	<div><div><div>ANDREWS</div><div>ENGINEERING, INC.</div><div>3300 Ginger Creek Drive, Springfield, IL 62711-7233 Tel (217) 787-2334 Fax (217) 787-9495 Pontiac, IL • Naperville, IL • Indianapolis, IN • Warrenton, MO</div></div></div>	REVISIONS																																									
	PLANS PREPARED FOR WINNEBAGO LANDFILL ROCKFORD, WINNEBAGO COUNTY, ILLINOIS		APPROVED BY: MTH	DESIGNED BY: MTH	DRAWN BY: MPN	<table><tr><th>NO.</th><th>DATE</th><th>DESCRIPTION</th><th>BY</th></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr><tr><td> </td><td> </td><td> </td><td> </td></tr></table>	NO.	DATE	DESCRIPTION	BY																																		
NO.	DATE	DESCRIPTION	BY																																									

FIG. 1




NOTE:
BACKGROUND IMAGE EXTRACTED FROM GOOGLE EARTH,
APRIL 23, 2006.



LEGEND

--- CURRENTLY PERMITTED FILL BOUNDARY

DATE: AUGUST 2010		SITE LOCATION MAP		 ANDREWS ENGINEERING, INC. 3300 Onger Creek Drive, Springfield, IL 62711-7233 Tel. (217) 787-2534 Fax (217) 787-8490 Peoria, IL 61604-2808 P.O. Box 81 - Bloomington, IL 61801	NO. DATE		REVISIONS			
PROJECT ID: 90-114		PLANS PREPARED FOR WINNEBAGO LANDFILL ROCKFORD, WINNEBAGO COUNTY, ILLINOIS			1 5/11/10		DESCRIPTION ADDED COORDINATE SYSTEM GRID		BY KEY	
SHEET NUMBER:										
FIG. 2				APPROVED BY: TMS DESIGNED BY: TMS DRAWN BY: MPN						

APPENDIX A
APPLICATION FORMS



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

Certification of Authenticity of Official Forms

This form must accompany any application submitted to the Illinois EPA Bureau of Land, Division of Land Pollution Control, Permit Section on forms other than the official copy printed and provided by the Illinois EPA. The only allowed changes to the form are in spacing, fonts, and the addition of the information provided. Any additions must be underlined. The forms would not be considered identical if there is any change to, addition or deletion of words on the form or to the language of the form.

The same individuals that sign the application form it accompanies must sign the following certification.

I hereby certify under penalty of law that I have personally examined, and am familiar with the application form or forms and all included supplemental information submitted to the Illinois EPA herewith, and that the official Illinois Environmental Protection Agency application form or forms used herein is or are identical in all respects to the official form or forms provided by the Illinois EPA Bureau of Land Permit Section, and has not or have not been altered, amended, or otherwise modified in any way. I further certify under penalty of law that any attached or included electronic data version of the application form or forms complies with the official Illinois EPA's Electronic version thereof, and is or are identical in all respects to the official electronically downloadable form or forms provided by the Illinois EPA Bureau of Land Permit Section, and has not or have not been altered, amended or otherwise modified in any way.

By: [Signature]
Owner Signature

3-1-2011

(date)

Esincerin, Manager
Title

By: [Signature]
Operator Signature

3-1-2011

(date)

Esincering Manager
Title

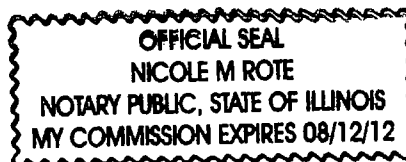
[Signature]
Engineer Signature
(if necessary)

4/4/2011

(date)

*Subscribed and Sworn to Before Me,
a Notary Public in and for the
above-mentioned County and State.*

[Signature]
Notary Public



My Commission Expires: 8/12/12

[Notary Seal]



Illinois Environmental Protection Agency

Page 1 of 4

Bureau of Land • 1021 N. Grand Avenue E. • Box 19276 • Springfield • Illinois • 62794-9276

General Application for Permit (LPC - PA1)

This form must be used for any application for permit, except for landscape waste composting or hazardous waste management facilities regulated in accordance with RCRA, Subtitle C from the Bureau of Land. One original, and two copies, or three if applicable, of all permit application forms must be submitted. Attach the original and appropriate number of copies of any necessary plans, specifications, reports, etc. to fully support and describe the activities and modifications being proposed. Attach sufficient information to demonstrate the compliance with all regulatory requirements. Incomplete applications will be rejected.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to the above address between 8:30 am and 5:00 pm, Monday through Friday (excluding State holidays).

NOTE: Please complete this form online, save a copy locally, print and submit it to the Permit Section #33, at the above address.

I. Site Identification:

Site Name: Winnebago Landfill IEPA ID Number: 2018080001
Street Address: 8403 Lindenwood Road P.O. Box: _____
City: Rockford State: IL Zip Code: 61109 County: Winnebago
Existing DE/OP Permit Numbers (if applicable): 1991-138-LF

2. Owner/Operator Identification:

Owner	Operator
Name: <u>Winnebago Landfill Company, LLC</u>	Name: <u>Winnebago Reclamation Service, Inc.</u>
Street Address: <u>5450 Wansford Way, Suite 201B</u>	Street Address: <u>5450 Wansford Way, Suite 201B</u>
PO Box: _____	PO Box: _____
City: <u>Rockford</u> State: <u>IL</u>	City: <u>Rockford</u> State: <u>IL</u>
Zip Code: <u>61109</u> Phone: _____	Zip Code: <u>61109</u> Phone: _____
Contact: <u>Tom Hilbert</u>	Contact: <u>Tom Hilbert</u>
Email Address: <u>thilbert@wcwastecompanies.com</u>	Email Address: <u>thilbert@wcwastecompanies.com</u>

TYPE OF SUBMISSION/REVIEW PERIOD:

New Landfill/180 days (35 IAC Part 813)
Landfill Expansion/180 days (35 IAC Part 813)
Sig. Mod. to Operate/90 days (35 IAC Part 813)
Other Sig. Mod./90 days (35 IAC Part 813)
Renewal of Landfill/90 days (35 IAC Part 813)
Developmental/90 days (35 IAC Part 807)
Operating/45 days (35 IAC Part 807)
Supplemental/90 days (35 IAC Part 807)
Permit Transfer/90 days (35 IAC Part 807)
Renewal of Experimental Permit (35 IAC Part 807)

TYPE OF FACILITY:

☐ Landfill
☐ Land Treatment
☐ Transfer Station
☒ Treatment Facility
☐ Storage
☐ Incinerator
☐ Composting
☐ Recycling/Reclamation
☐ Other (Specify) _____

TYPE OF WASTE:

☒ General Municipal Refuse
☐ Hazardous
☒ Special (Non-Hazardous)
☐ Chemical Only (exec. putrescible)
☐ Inert Only (exec. chem. & putrescible)
☐ Used Oil
☐ Potentially Infectious Medical Waste
☐ Landscape/Yard Waste
☐ Other (Specify) _____

3. Description of this Permit Request:

Alternate source demonstration in accordance with Condition VIII.15 (Modification No. 46).

4. Completeness Requirements

The following items must be checked Yes, No or N/A. Each item will be reviewed for completeness by the log clerk. Blank items will result in rejection of the application. Please refer to the instructions for further guidance.

1. Have all required public notice letters been mailed in accordance with the LPC-PA16 instructions? ☒ Yes ☐ No ☐ N/A

(If so, provide a list of those recipients of the required public notice letters for Illinois EPA retention. Such retention shall not imply any Illinois EPA review and/or confirmation of the list.)

Public Notice Recipients

Name: Dave Syverson Title: Senator - District 34
 Street Address: 200 South Wyman Street, Suite 302 P.O. Box: _____
 City: Rockford State: IL Zip Code: 61101 Phone: _____

Name: Charles Jefferson Title: Representative - District 67
 Street Address: 200 South Wyman Street, Suite 304 P.O. Box: _____
 City: Rockford State: IL Zip Code: 61101 Phone: _____

Name: Phillip Nicolosi Title: State's Attorney
 Street Address: 400 West State Street P.O. Box: _____
 City: Rockford State: IL Zip Code: 61101 Phone: _____

Name: Scott Christiansen Title: County Chairman
 Street Address: 404 Elm Street, Room 504 P.O. Box: _____
 City: Rockford State: IL Zip Code: 61101 Phone: _____

Name: Village of New Milford Title: Village Clerk
 Street Address: 6771 11th Street P.O. Box: _____
 City: Rockford State: IL Zip Code: 61109 Phone: _____

Name: Village of Davis Junction Title: Village Clerk
 Street Address: 106 North Elm Street P.O. Box: 207
 City: Davis Junction State: IL Zip Code: 61020 Phone: _____

Name: Cherry Valley Township Title: _____
 Street Address: 487 South Blackhawk Road P.O. Box: _____
 City: Rockford State: IL Zip Code: 61109 Phone: _____

2. a. Is the Siting Certification Form (LPC-PA8) completed and enclosed?

☐ Yes ☐ No ☒ N/A

- b. Is siting approval currently under litigation?

☐ Yes ☒ No ☐ N/A

3. a. Is a closure, and if necessary a post-closure plan covering these activities being submitted, or ☐ Yes ☒ No ☐ N/A

b. has one already been approved? If yes, provide the permit number: 1991-138-1 E

4. a. For waste disposal sites, only: Has any employee, owner, operator, officer or director of the owner or operator had a prior conduct certification denied, canceled or revoked? ☐ Yes ☒ No ☐ N/A

b. Have you included a demonstration of how you comply or intend to comply with 35 Ill. Adm. Code 745? ☐ Yes ☐ No ☒ N/A

5. a. Is land ownership held in beneficial trust? ☐ Yes ☒ No ☐ N/A

b. If yes, is a beneficial trust certification form (LPC-PA9) completed and enclosed? ☐ Yes ☐ No ☒ N/A

6. a. Does the application contain information or proposals regarding the hydrogeology; groundwater monitoring, modeling or classification; a groundwater impact assessment; or vadose zone monitoring for which you are requesting approval? ☒ Yes ☐ No ☐ N/A

b. If yes, have you submitted a third copy of the application (4 total) and supporting documents? ☒ Yes ☐ No ☐ N/A

5. Signatures:

Original signatures are required. Signature stamps or applications transmitted electronically or by FAX are not acceptable.

All applications shall be signed by the person designated below as a duly authorized representative of the owner an/or operator.

Corporation - By a principal executive officer of the level of vice-president or above.

Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.

Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative of the owner and operator only if:

1. They meet the criteria above or the authorization has been granted in writing by a person described above; and
2. Is submitted with this application (a copy of a previously submitted authorization can be used).

I hereby affirm that all information contained in this application is true and accurate to the best of my knowledge and belief. I do herein swear that I am a duly authorized representative of the owner/operator and I am authorized to sign this permit application form.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

[Signature]

Owner Signature:

3-1-2011

Date:

Thomas Hilbert

Printed Name:

Engineering Manager

Title:

Notary: Subscribed and Sworn before me this 1st day of March 2011.

My commission expires on: 8/12/12

OFFICIAL SEAL
NICOLE M ROTE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 08/12/12

[Signature]

Signature & Stamp/Seal of Notary Public

[Signature]

Operator Signature:

3-1-2011

Date:

Thomas Hilbert

Printed Name:

Engineering Manager

Title:

Notary: Subscribed and Sworn before me this 1st day of March 2011.

My commission expires on: 8/12/12

[Signature]

Signature & Stamp/Seal of Notary Public

OFFICIAL SEAL
NICOLE M ROTE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 08/12/12

Engineer's Name: JEREMY C. POETZSCHER

Engineer's Title: PROJECT ENGINEER

Company: ANDREWS ENGINEERING, INC.

Registration Number: 062-061274

Street Address: 3300 GINGER CREEK DRIVE

PO Box: _____

City: SPRINGFIELD State: IL

Zip Code: 62711

Phone: 214-444-2334

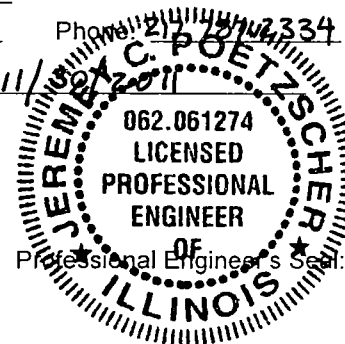
Email Address: jpoetzsch@andrews-eng.com

License Expiration Date: 11/30/2011

Signature: [Signature]

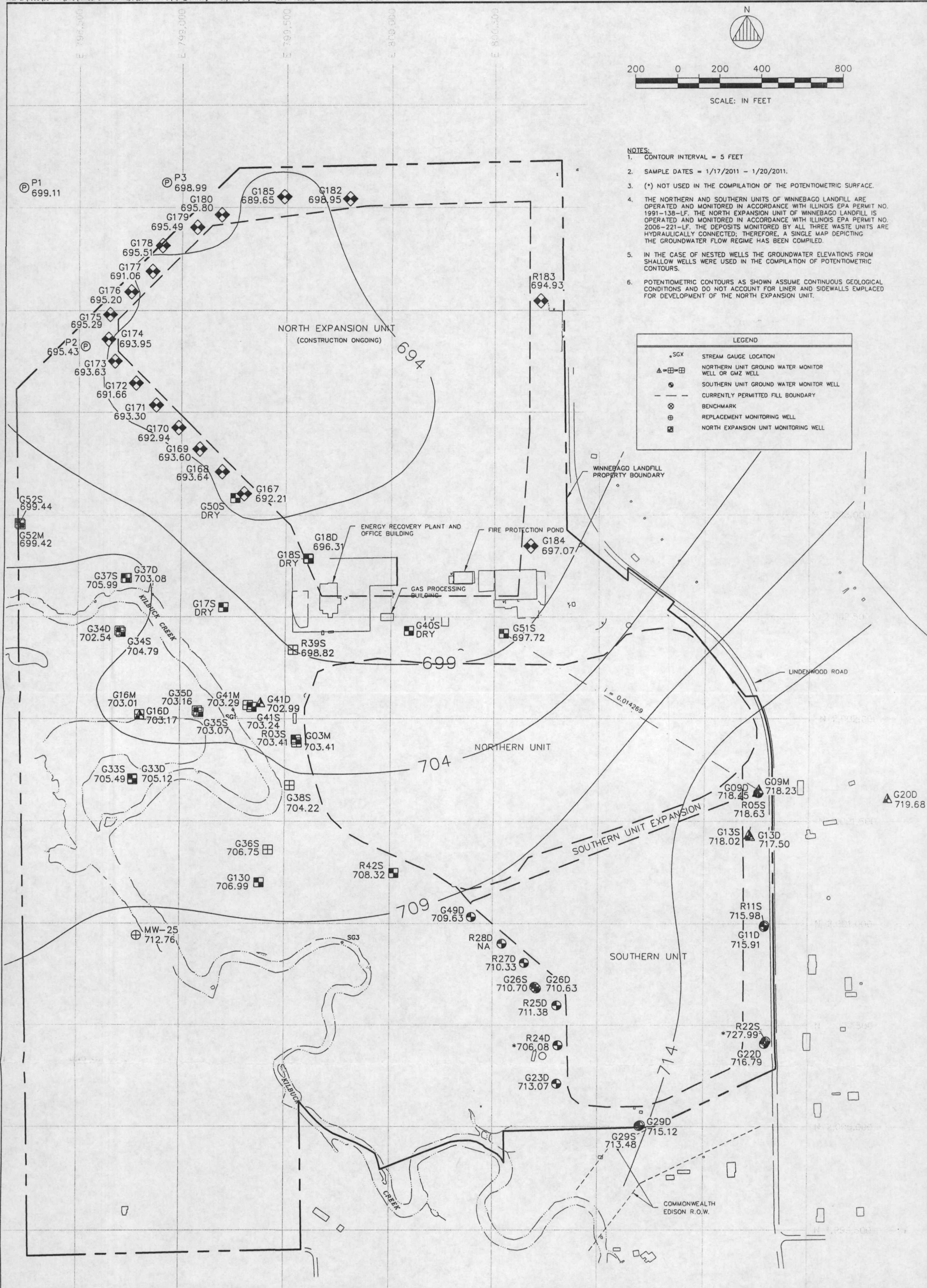
Date: 4/4/2011

Professional Engineer's Seal:



APPENDIX B

Potentiometric Surface Maps



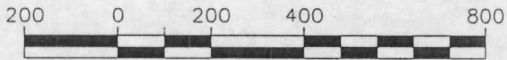
- NOTES:
1. CONTOUR INTERVAL = 5 FEET
 2. SAMPLE DATES = 1/17/2011 - 1/20/2011.
 3. (*) NOT USED IN THE COMPILATION OF THE POTENTIOMETRIC SURFACE.
 4. THE NORTHERN AND SOUTHERN UNITS OF WINNEBAGO LANDFILL ARE OPERATED AND MONITORED IN ACCORDANCE WITH ILLINOIS EPA PERMIT NO. 1991-138-LF. THE NORTH EXPANSION UNIT OF WINNEBAGO LANDFILL IS OPERATED AND MONITORED IN ACCORDANCE WITH ILLINOIS EPA PERMIT NO. 2006-221-LF. THE DEPOSITS MONITORED BY ALL THREE WASTE UNITS ARE HYDRAULICALLY CONNECTED; THEREFORE, A SINGLE MAP DEPICTING THE GROUNDWATER FLOW REGIME HAS BEEN COMPILED.
 5. IN THE CASE OF NESTED WELLS THE GROUNDWATER ELEVATIONS FROM SHALLOW WELLS WERE USED IN THE COMPILATION OF POTENTIOMETRIC CONTOURS.
 6. POTENTIOMETRIC CONTOURS AS SHOWN ASSUME CONTINUOUS GEOLOGICAL CONDITIONS AND DO NOT ACCOUNT FOR LINER AND SIDEWALLS EMPLOYED FOR DEVELOPMENT OF THE NORTH EXPANSION UNIT.

LEGEND	
SGX	STREAM GAUGE LOCATION
▲	NORTHERN UNIT GROUND WATER MONITOR WELL OR GMZ WELL
●	SOUTHERN UNIT GROUND WATER MONITOR WELL
- - -	CURRENTLY PERMITTED FILL BOUNDARY
⊗	BENCHMARK
⊕	REPLACEMENT MONITORING WELL
⊞	NORTH EXPANSION UNIT MONITORING WELL

POTENTIOMETRIC SURFACE MAP 1ST QUARTER 2011		 ANDREWS ENGINEERING, INC. 3300 Ginger Creek Drive, Springfield, IL 62711-7233 Tel (217) 787-2334 Fax (217) 787-9495 Pontiac, IL • Naperville, IL • Indianapolis, IN • Warrenton, MO	REVISIONS			
PLANS PREPARED FOR WINNEBAGO LANDFILL ROCKFORD, WINNEBAGO COUNTY, ILLINOIS			NO.	DATE	DESCRIPTION	BY
APPROVED BY: JLR		DESIGNED BY: JLR		DRAWN BY: MPN		

1011

DATE: FEBRUARY 2011
PROJECT ID: 90-114
SHEET NUMBER:

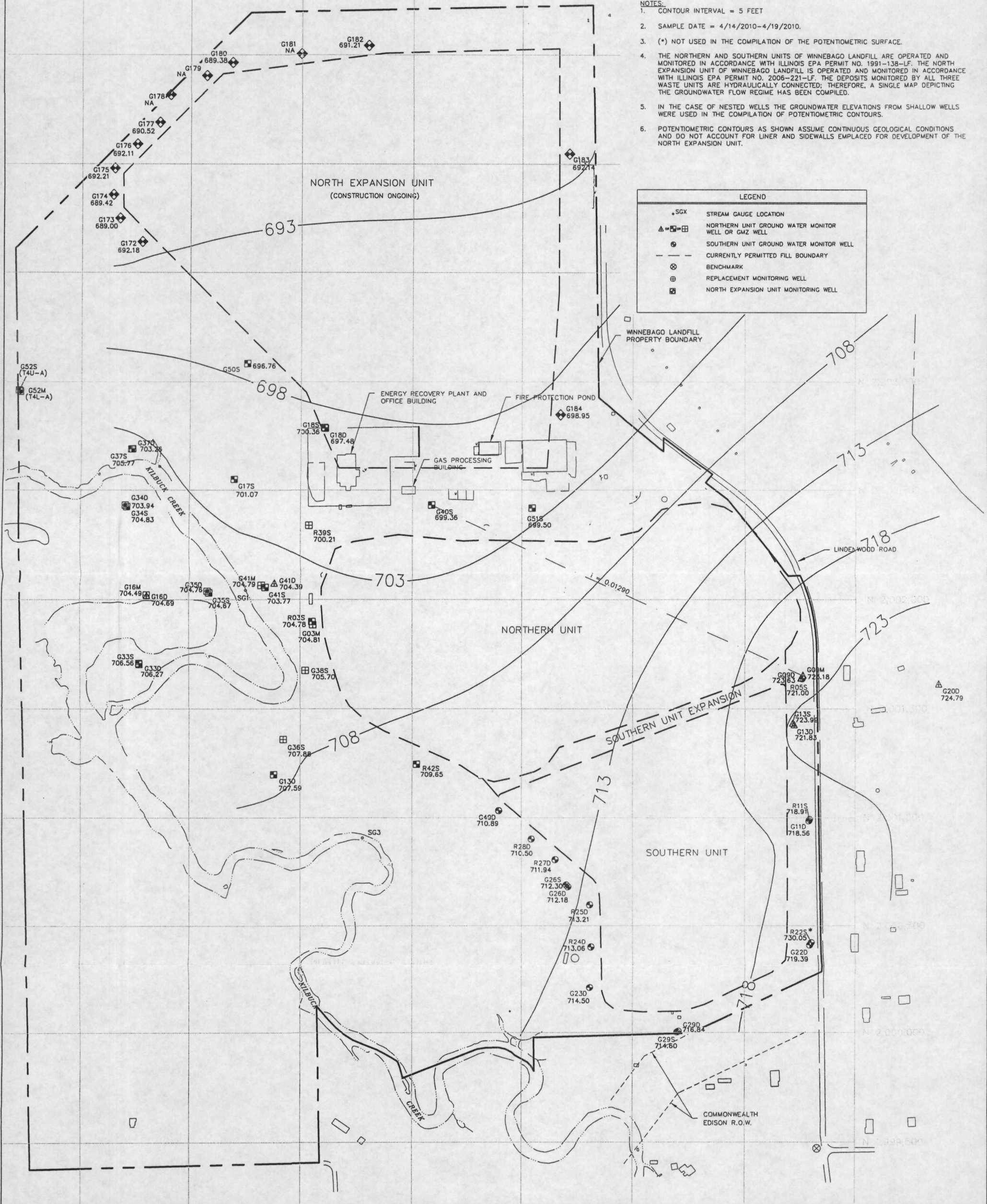


SCALE: IN FEET

NOTES:

1. CONTOUR INTERVAL = 5 FEET
2. SAMPLE DATE = 4/14/2010-4/19/2010.
3. (*) NOT USED IN THE COMPILATION OF THE POTENTIOMETRIC SURFACE.
4. THE NORTHERN AND SOUTHERN UNITS OF WINNEBAGO LANDFILL ARE OPERATED AND MONITORED IN ACCORDANCE WITH ILLINOIS EPA PERMIT NO. 1991-138-LF. THE NORTH EXPANSION UNIT OF WINNEBAGO LANDFILL IS OPERATED AND MONITORED IN ACCORDANCE WITH ILLINOIS EPA PERMIT NO. 2006-221-LF. THE DEPOSITS MONITORED BY ALL THREE WASTE UNITS ARE HYDRAULICALLY CONNECTED; THEREFORE, A SINGLE MAP DEPICTING THE GROUNDWATER FLOW REGIME HAS BEEN COMPILED.
5. IN THE CASE OF NESTED WELLS THE GROUNDWATER ELEVATIONS FROM SHALLOW WELLS WERE USED IN THE COMPILATION OF POTENTIOMETRIC CONTOURS.
6. POTENTIOMETRIC CONTOURS AS SHOWN ASSUME CONTINUOUS GEOLOGICAL CONDITIONS AND DO NOT ACCOUNT FOR LINER AND SIDEWALLS EMPLACED FOR DEVELOPMENT OF THE NORTH EXPANSION UNIT.

LEGEND	
SGX	STREAM GAUGE LOCATION
△ □ □ □	NORTHERN UNIT GROUND WATER MONITOR WELL OR GMZ WELL
●	SOUTHERN UNIT GROUND WATER MONITOR WELL
- - -	CURRENTLY PERMITTED FILL BOUNDARY
⊗	BENCHMARK
⊕	REPLACEMENT MONITORING WELL
⊞	NORTH EXPANSION UNIT MONITORING WELL



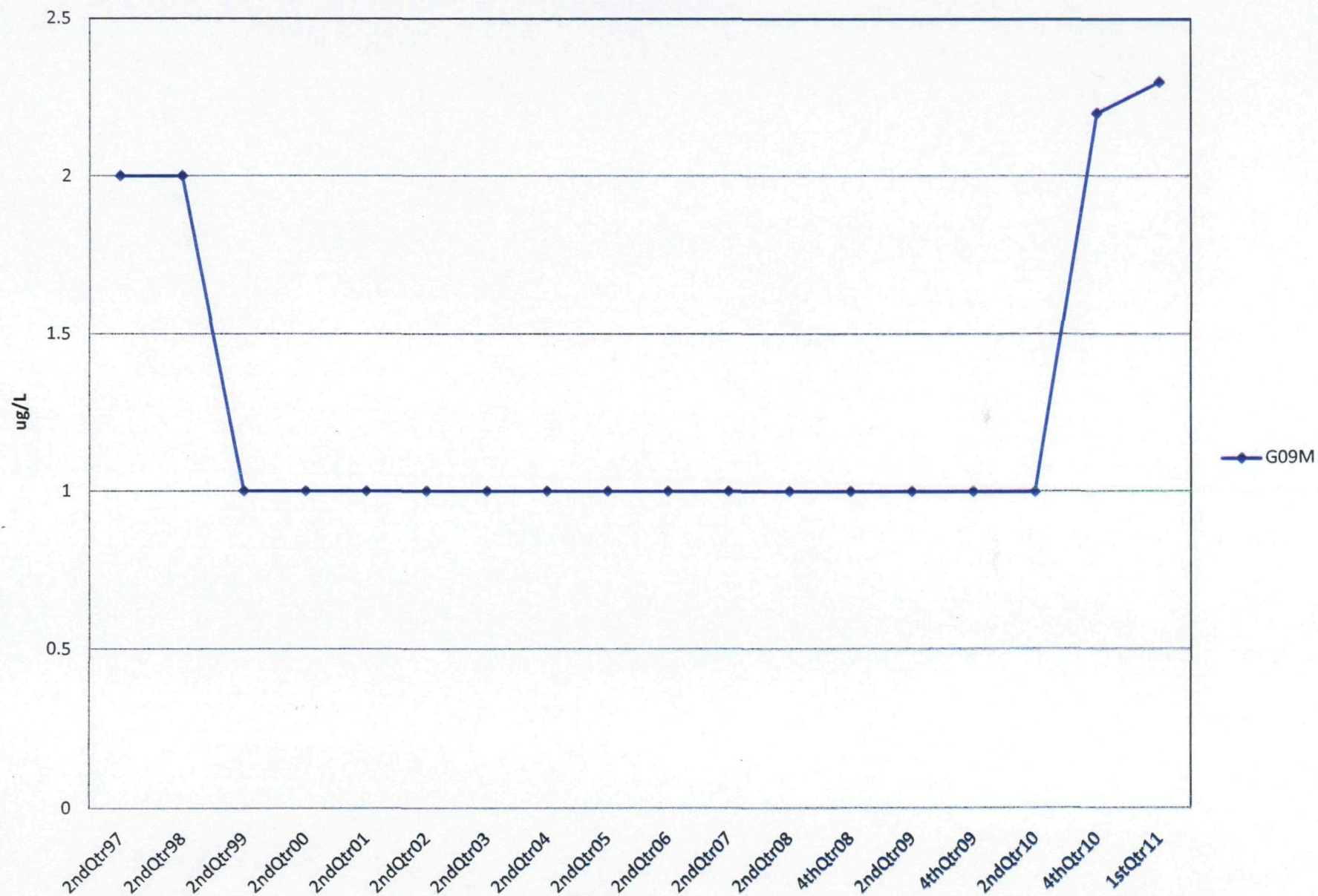
APPENDIX C

Graphical Trend Analyses

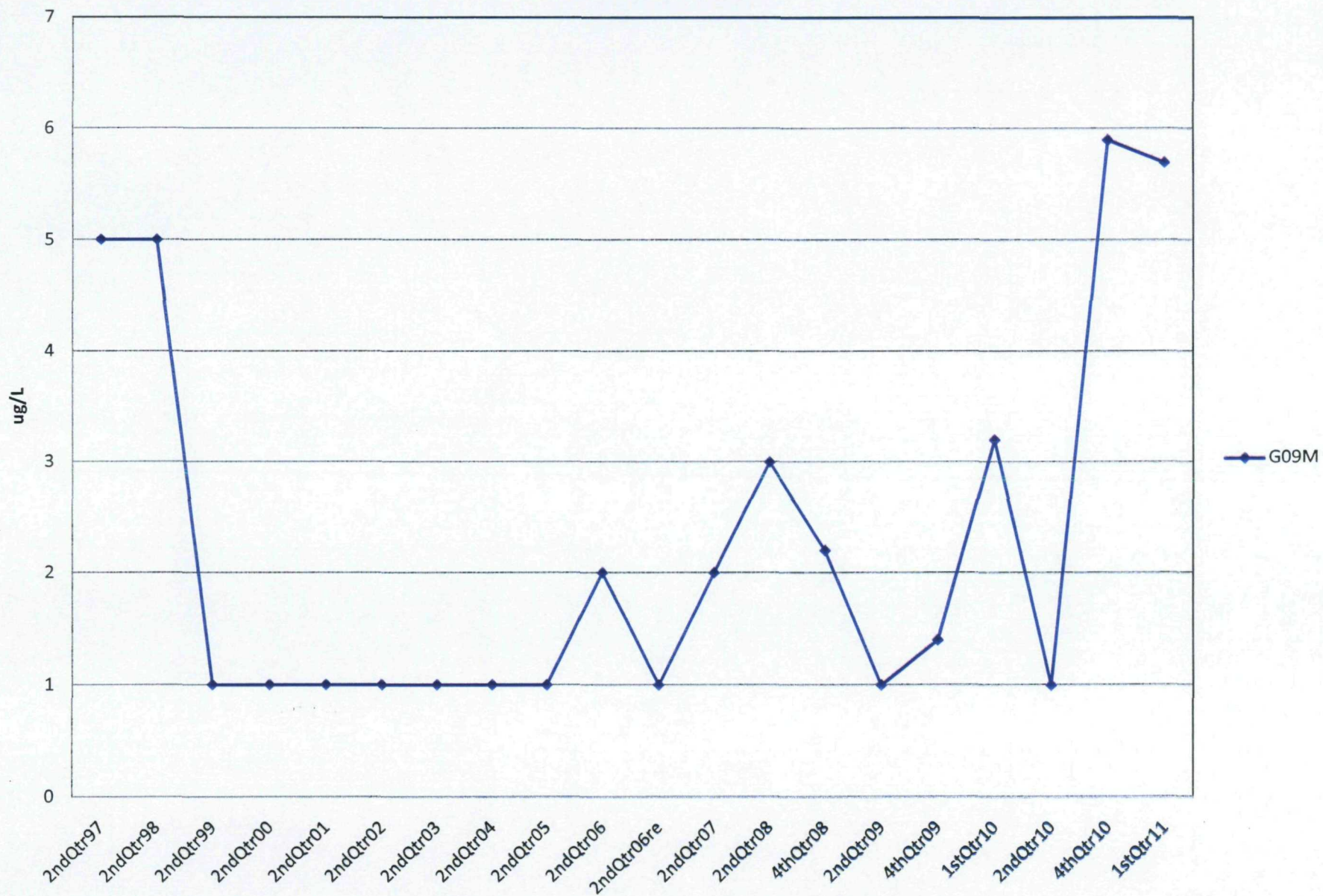
Winnebago Landfill

Northern Unit

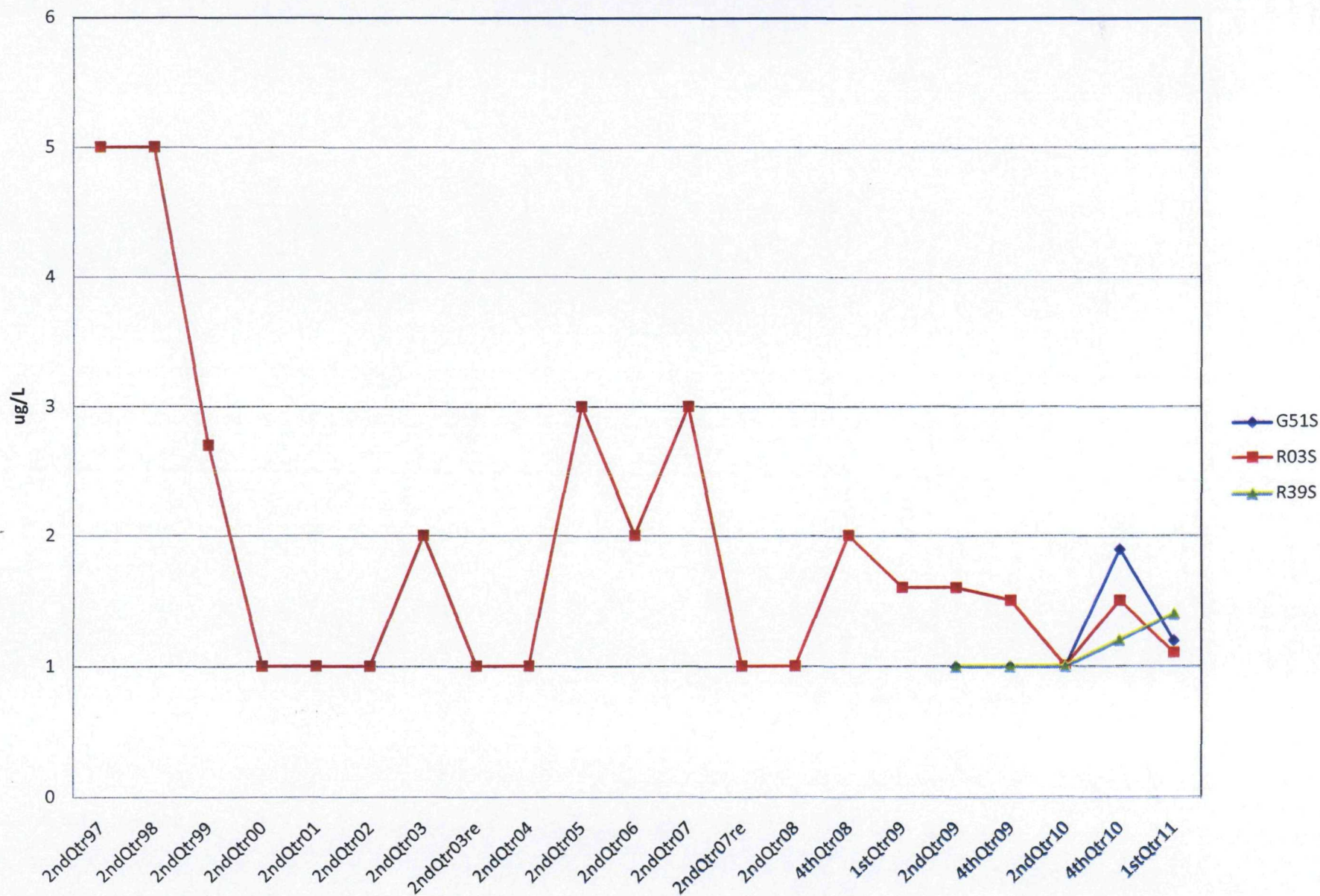
Benzene



Winnebago Landfill
Northern Unit
Chlorobenzene

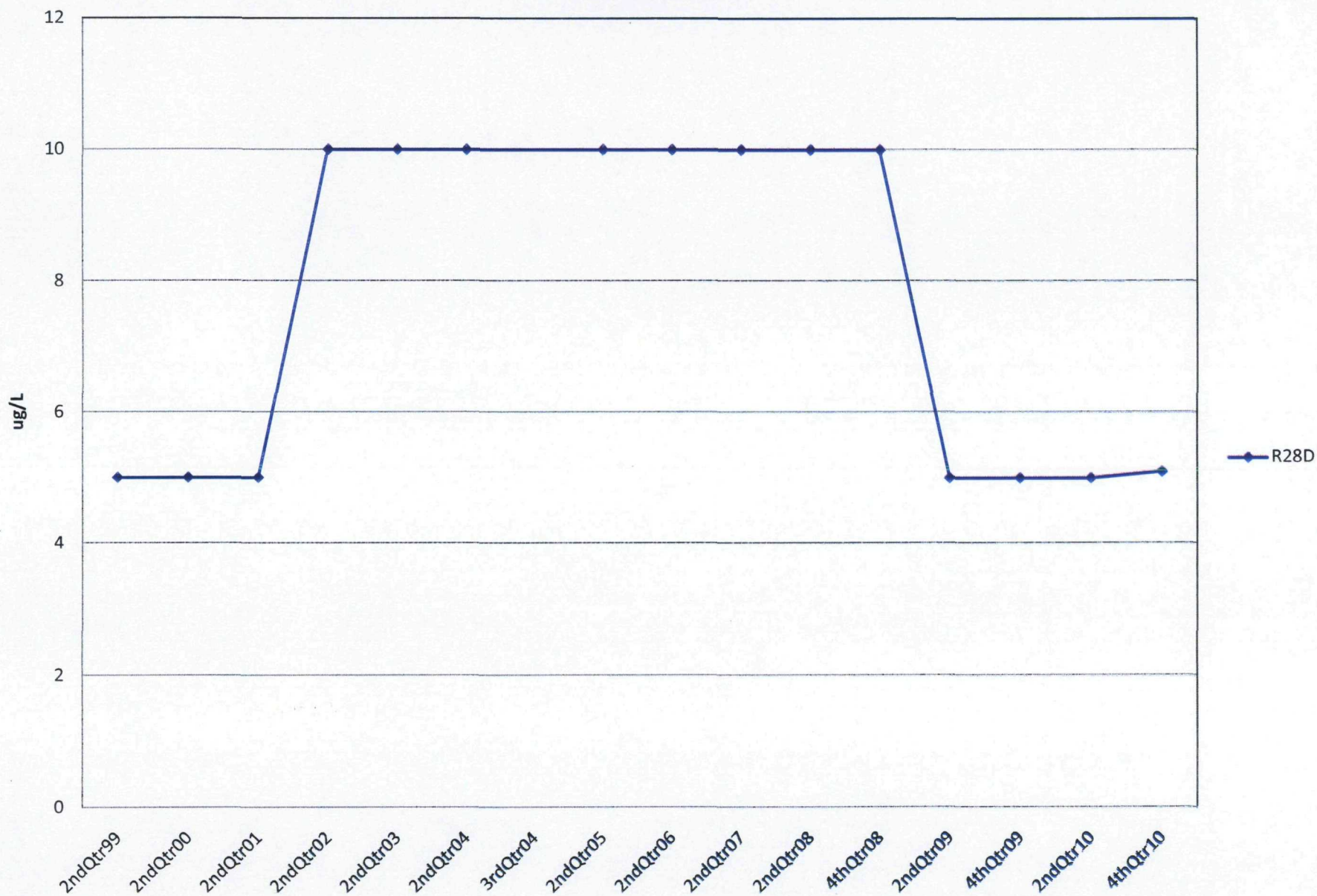


Winnebago Landfill
Northern Unit
Cis-1,2-Dichloroethene

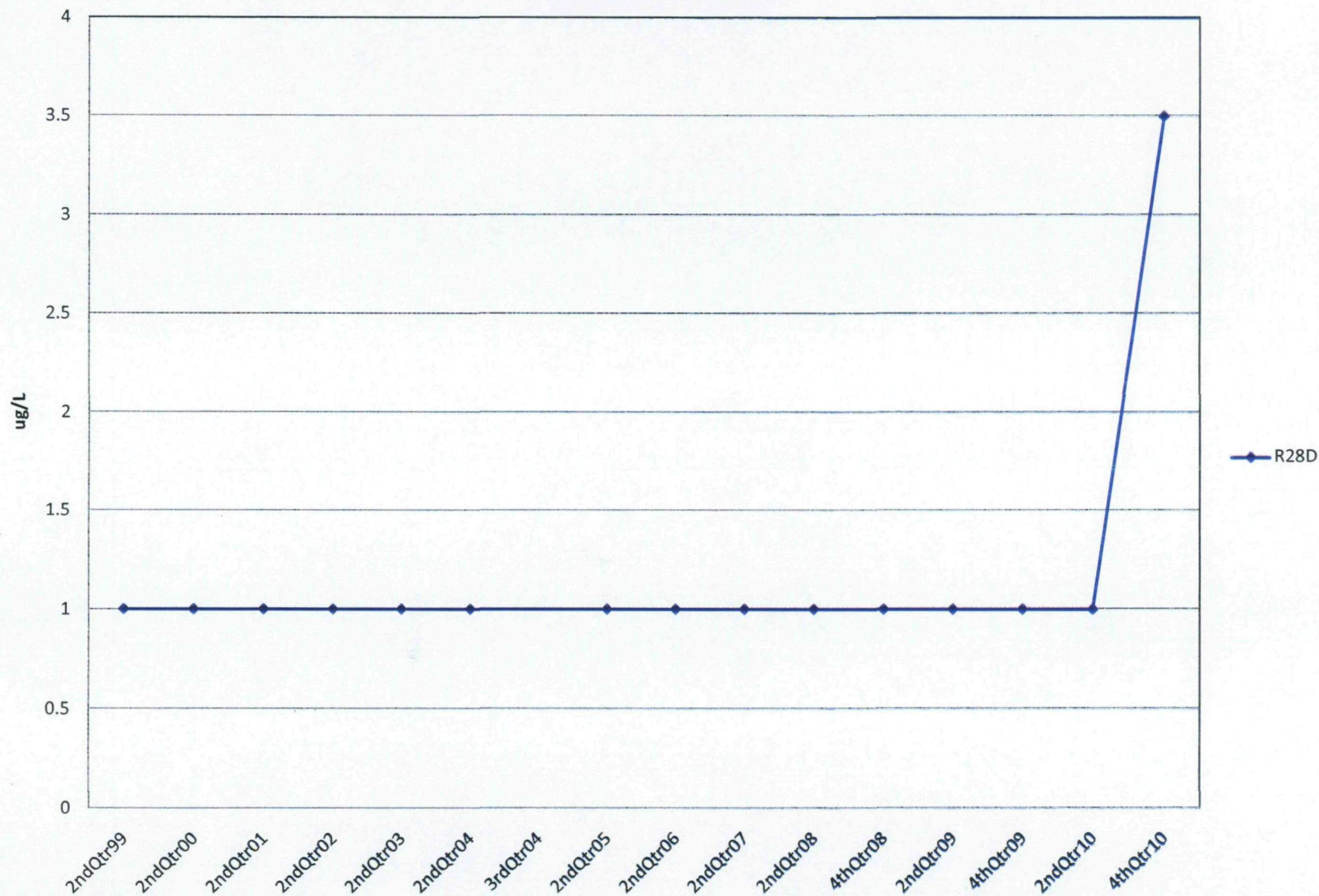


Winnebago Landfill Southern Unit

Acetone



Winnebago Landfill
Southern Unit
Carbon Disulfide



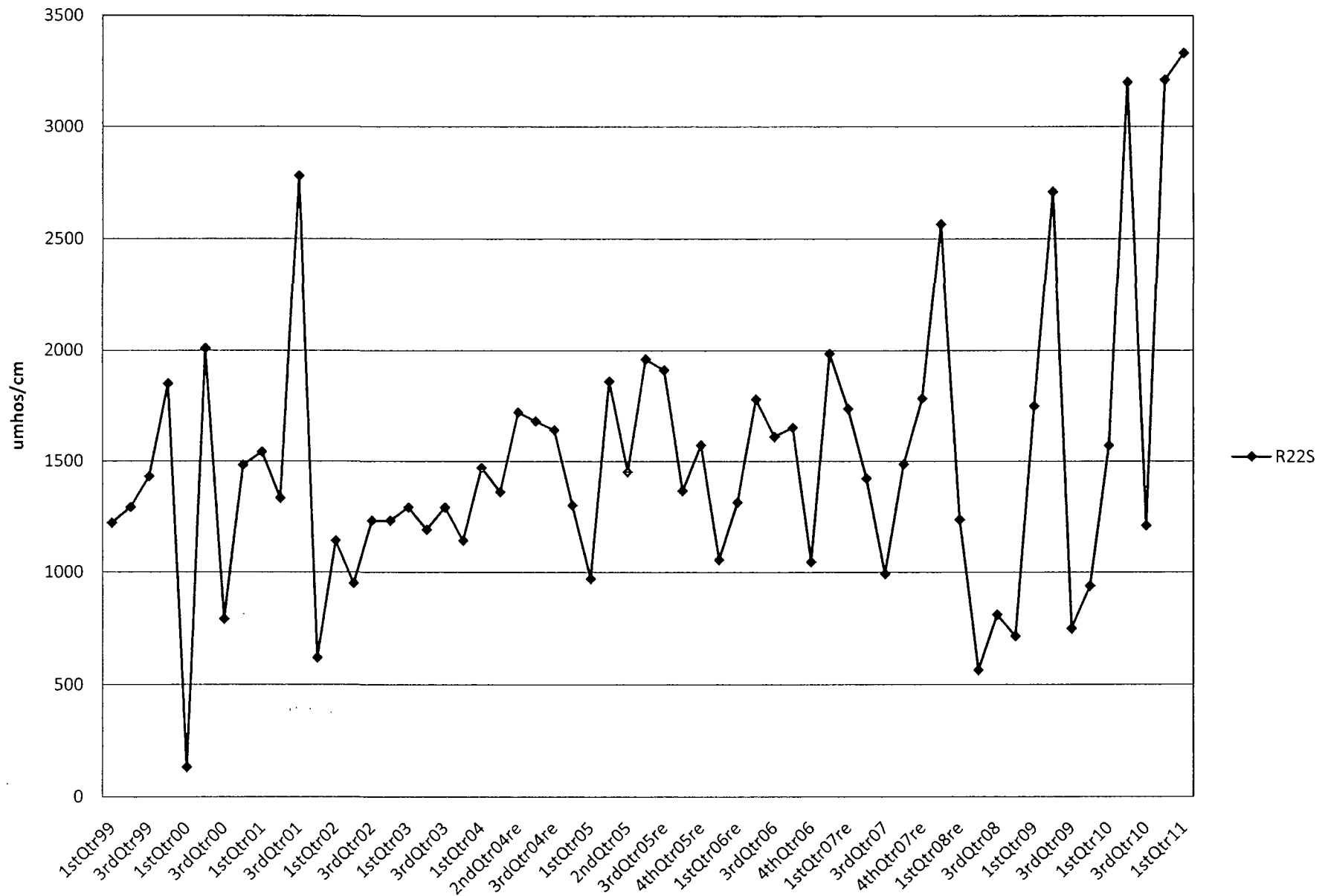
Winnebago Landfill
Southern Unit
Cis-1,2-Dichloroethene



Winnebago Landfill

Southern Unit

Specific Conductance



APPENDIX D
Field/Equipment Blank Analytical

**PDC Laboratories, Inc.**

2231 W. Altorfer Drive - Peoria, IL 61615
 (309) 692-9688 - (800) 752-6651 - FAX (309) 692-9689

**Laboratory Results**

William Charles Waste Companies
 5450 Wansford Way, Suite 201b

Rockford, IL 61109-1759
 Attn : Evan Buskohl

Date Received : 10/08/10 15:26

Report Date 01/12/11

Customer # : 209324

P.O. Number : Page1 N-GW

Facility :

Sample No: **10102021-7**

Collect Date **10/08/10 12:55**

Client ID : **NORTH UNIT**

Site : **EQUIPMENT BLANK**

Locator : **WINNEBAGO LF**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 8260B				
1,1,1,2-Tetrachloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,1,1-Trichloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,1,2,2-Tetrachloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,1,2-Trichloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,1-Dichloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,1-Dichloroethene	<	1 ug/l	10/18/10 11:26	JMB
1,1-Dichloropropene	<	1 ug/l	10/18/10 11:26	JMB
1,2,3-Trichlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
1,2,3-Trichloropropane	<	1 ug/l	10/18/10 11:26	JMB
1,2,4-Trichlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
1,2,4-Trimethylbenzene	<	1 ug/l	10/18/10 11:26	JMB
1,2-Dichlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
1,2-Dichloroethane	<	1 ug/l	10/18/10 11:26	JMB
1,2-Dichloropropane	<	1 ug/l	10/18/10 11:26	JMB
1,3,5-Trimethylbenzene	<	1 ug/l	10/18/10 11:26	JMB
1,3-Dichlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
1,3-Dichloropropane	<	1 ug/l	10/18/10 11:26	JMB
1,3-Dichloropropene	<	1 ug/l	10/18/10 11:26	JMB
1,4-Dichlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
2,2-Dichloropropane	<	1 ug/l	10/18/10 11:26	JMB
2-Butanone		39 ug/l	10/18/10 11:26	JMB
2-Chlorotoluene	<	1 ug/l	10/18/10 11:26	JMB
2-Hexanone		8.4 ug/l	10/18/10 11:26	JMB
4-Chlorotoluene	<	1 ug/l	10/18/10 11:26	JMB
4-Methyl-2-pentanone	<	5 ug/l	10/18/10 11:26	JMB
Acetone		58 ug/l	10/18/10 11:26	JMB
Acrylonitrile	<	5 ug/l	10/18/10 11:26	JMB
Benzene	<	1 ug/l	10/18/10 11:26	JMB
Bromobenzene	<	1 ug/l	10/18/10 11:26	JMB
Bromochloromethane	<	1 ug/l	10/18/10 11:26	JMB
Bromodichloromethane	<	1 ug/l	10/18/10 11:26	JMB
Bromoform	<	1 ug/l	10/18/10 11:26	JMB
Bromomethane	<	2 ug/l	10/18/10 11:26	JMB
Carbon Disulfide	<	1 ug/l	10/18/10 11:26	JMB
Carbon Tetrachloride	<	1 ug/l	10/18/10 11:26	JMB
Chlorobenzene	<	1 ug/l	10/18/10 11:26	JMB
Chloroethane	<	2 ug/l	10/18/10 11:26	JMB
Chloroform	<	1 ug/l	10/18/10 11:26	JMB
Chloromethane	<	2 ug/l	10/18/10 11:26	JMB
cis-1,2-Dichloroethene	<	1 ug/l	10/18/10 11:26	JMB
cis-1,3-Dichloropropene	<	1 ug/l	10/18/10 11:26	JMB
Dibromochloromethane	<	1 ug/l	10/18/10 11:26	JMB
Dibromomethane	<	1 ug/l	10/18/10 11:26	JMB
Dichlorodifluoromethane	<	1 ug/l	10/18/10 11:26	JMB
Ethylbenzene	<	1 ug/l	10/18/10 11:26	JMB
Hexachlorobutadiene	<	2 ug/l	10/18/10 11:26	JMB

**PDC Laboratories, Inc.**

2231 W. Altorfer Drive - Peoria, IL 61615
 (309) 692-9688 - (800) 752-6651 - FAX (309) 692-9689

**Laboratory Results**

William Charles Waste Companies
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Rockford, IL 61109-1759
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Date Received : 10/08/10 15:26
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 Customer # : 209324
 P.O. Number : Pagel N-GW
 Facility :

Sample No: 10102021-8	Collect Date 10/08/10 13:00
Client ID : NORTH UNIT	Site : FIELD BLANK
	Locator : WINNEBAGO LF

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 8260B				
1,1,1,2-Tetrachloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,1,1-Trichloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,1,2,2-Tetrachloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,1,2-Trichloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,1-Dichloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,1-Dichloroethene	<	1 ug/l	10/18/10 11:59	JMB
1,1-Dichloropropene	<	1 ug/l	10/18/10 11:59	JMB
1,2,3-Trichlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
1,2,3-Trichloropropane	<	1 ug/l	10/18/10 11:59	JMB
1,2,4-Trichlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
1,2,4-Trimethylbenzene	<	1 ug/l	10/18/10 11:59	JMB
1,2-Dichlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
1,2-Dichloroethane	<	1 ug/l	10/18/10 11:59	JMB
1,2-Dichloropropane	<	1 ug/l	10/18/10 11:59	JMB
1,3,5-Trimethylbenzene	<	1 ug/l	10/18/10 11:59	JMB
1,3-Dichlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
1,3-Dichloropropane	<	1 ug/l	10/18/10 11:59	JMB
1,3-Dichloropropene	<	1 ug/l	10/18/10 11:59	JMB
1,4-Dichlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
2,2-Dichloropropane	<	1 ug/l	10/18/10 11:59	JMB
2-Butanone		16 ug/l	10/18/10 11:59	JMB
2-Chlorotoluene	<	1 ug/l	10/18/10 11:59	JMB
2-Hexanone		7.5 ug/l	10/18/10 11:59	JMB
4-Chlorotoluene	<	1 ug/l	10/18/10 11:59	JMB
4-Methyl-2-pentanone	<	5 ug/l	10/18/10 11:59	JMB
Acetone		65 ug/l	10/18/10 11:59	JMB
Acrylonitrile	<	5 ug/l	10/18/10 11:59	JMB
Benzene	<	1 ug/l	10/18/10 11:59	JMB
Bromobenzene	<	1 ug/l	10/18/10 11:59	JMB
Bromochloromethane	<	1 ug/l	10/18/10 11:59	JMB
Bromodichloromethane	<	1 ug/l	10/18/10 11:59	JMB
Bromoform	<	1 ug/l	10/18/10 11:59	JMB
Bromomethane	<	2 ug/l	10/18/10 11:59	JMB
Carbon Disulfide	<	1 ug/l	10/18/10 11:59	JMB
Carbon Tetrachloride	<	1 ug/l	10/18/10 11:59	JMB
Chlorobenzene	<	1 ug/l	10/18/10 11:59	JMB
Chloroethane	<	2 ug/l	10/18/10 11:59	JMB
Chloroform	<	1 ug/l	10/18/10 11:59	JMB
Chloromethane	<	2 ug/l	10/18/10 11:59	JMB
cis-1,2-Dichloroethene	<	1 ug/l	10/18/10 11:59	JMB
cis-1,3-Dichloropropene	<	1 ug/l	10/18/10 11:59	JMB
Dibromochloromethane	<	1 ug/l	10/18/10 11:59	JMB
Dibromomethane	<	1 ug/l	10/18/10 11:59	JMB
Dichlorodifluoromethane	<	1 ug/l	10/18/10 11:59	JMB
Ethylbenzene	<	1 ug/l	10/18/10 11:59	JMB
Hexachlorobutadiene	<	2 ug/l	10/18/10 11:59	JMB



PDC Laboratories, Inc.

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Laboratory Results

William Charles Waste Companies
5450 Wansford Way, Suite 201b

Rockford, IL 61109-1759
Attn : Evan Buskohl

Date Received : 10/08/10 15:26
Report Date 01/12/11
Customer # : 209324
P.O. Number : Pagel N-GW
Facility :

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Certified by: Gail Schindler
Gail Schindler, Project Manager

APPENDIX E

Statistical Method

Statistical Analyses Method

References:

1. 35 Illinois Administrative Code 811.320
2. "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, Interim Final Guidance." Office of Solid Waste, USEPA, April 1989.
3. "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, Addendum to Interim Final Guidance." Office of Solid Waste, USEPA, July 1992.
4. "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, Addendum to Interim Final Guidance." Office of Solid Waste, USEPA, January 1993.

Background quality shall be determined using the statistical techniques set forth in 35 IAC 811.320(e). The data was tested for normality using the Shapiro-Wilk normality test. If the data was found not to follow a normal distribution, a nonparametric statistical method was utilized. The data was examined for outliers by the method described in the "Statistical Analysis of Ground-Water Monitoring, Interim Final Guidance and Addendum to Interim Final Guidance." After the outlier test the percentages of non-detect values (NDs) shall be calculated for each parameter to determine the applicable ND treatment method, if any. Once the treatment of non-detect values is done, the prediction limit for each parameter shall be calculated using the mean, standard deviation, and the appropriate t value. The statistical analysis uses a one-tailed test to determine an upper limit of significance. The upper prediction limit shall be the concentration for the probability that the constituent can be measured without constituting a statistical increase above the background. Any concentration found below this limit is regarded as falling within the normal statistical population.

Statistical Method

The statistical method shall employ the 99% confidence limit (99% CL) for all interwell calculations and the 99% confidence limit (99% CL) for all intrawell calculations, which incorporates the mean, standard deviation, number of samples, and the Student's t value in the calculation of a confidence limit to determine general background groundwater quality. An upper confidence limit shall be calculated for each individual chemical parameter. The well data from the site shall be evaluated statistically with samples collected during four (4) consecutive quarters of background sampling.

Handling of Outliers

Prior to statistical analyses the data set was evaluated for outliers. Outliers are defined as data points that vary significantly from the mean value for that data set. Outliers may represent

sampling error, contamination from surface run-off, analytical laboratory error, or anomalous site conditions. Outliers, if not removed from the data set, can erroneously increase the AGQS and minimize the occurrence of an exceedences related to a release from a waste unit. Once a statistical outlier has been identified, the concentrations shall be evaluated to determine the cause. If a valid reason has been determined for the outlier the data point will be removed from the data set. If no specific reason can be documented the point will considered representative and included in the analysis. Statistical analysis will then be conducted as described below.

Handling of Non-Detects (NDs)

Non-detect values (NDs) were handled according to the percentage of Non-Detects (%ND) present in the background sampling. The %ND was calculated for each parameter from the pooled background data of each well set. The data treatment was done according to the following criteria:

- a) For under 0% NDs, no adjustment is made to the values in the data set.
- b) For under 15% NDs, the value of one-half ($\frac{1}{2}$) the reported Detection Limit (DL) was substituted for the ND value, and the mean and standard deviation were calculated using detected values with the substituted ND values.
- c) For 15-50% NDs, Cohen's Adjustment was used to adjust the mean and standard deviation. The adjusted mean and standard deviation was then used to calculate the Confidence Limit.
- d) For over 50% but not 100% NDs, the highest recorded concentration was substituted for the prediction limit.
- e) For 100% NDs, the Method Detection Limit (MDL) will be substituted for the ND value. The mean and standard deviation was calculated using the substituted ND values.

Confidence Limit

The statistical procedure was conducted according to the following steps:

1. Calculate arithmetic mean

The arithmetic mean was calculated using the pooled data for each parameter. The arithmetic mean (X_b) was calculated using the following equation:

$$X_b = \frac{X_1 + X_2 + \dots + X_n}{n}$$

where: X_b = Average background value

X_n = Individual background value for n sample

n = Number of background values

2. Calculate standard deviation

The standard deviation was calculated using the pooled data for each parameter. The standard deviation was calculated using the following equation:

$$S_b = \sqrt{\frac{(X_1 - X_b) + (X_2 - X_b) + \dots + (X_n - X_b)}{n - 1}}$$

where: S_b = Population standard deviation
 X_n = Individual background value for n sample
 X_b = Mean (1)
 n = Number of background samples

3. Calculate the 99% Upper Confidence Limit (Intrawell Values)

The 99% Upper Confidence Limit was calculated for each parameter using the mean (1), the standard deviation (2), the number of background samples, and the Student's t value given for $\sigma = 0.01$ (99% Confidence). The Student's t value varies upon the number of background samples. For those parameters with greater than 50% but not 100% NDs, the Cohen Method was utilized to calculate the 99% Confidence Limit. The methodology described in "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities: Addendum to Interim Final Guidance" dated January 28, 1993 was used to calculate the Cohen Confidence Limit. The 99% Upper Confidence Limit for the remaining parameters was calculated using the following equation:

$$CL = X_b + S_b \cdot t \cdot \sqrt{1 + \frac{1}{n}}$$

where: CL = Upper Confidence Limit (Upper and Lower for pH)
 X_b = Mean (1)
 S_b = Standard Deviation (2)
 t = Student's t value at 0.01 significance (99% Confidence)
 n = Number of background samples

4. Calculate the 99% Upper Confidence Limit (Interwell Values)

The 99% Upper Confidence Limit was calculated for each parameter using the mean (1), the standard deviation (2), the number of background samples, and the Student's t value given for $\sigma = 0.01$ (99% Confidence). The Student's t value varies upon the number of background samples. For those parameters with greater than 50% but not 100% NDs, the Cohen Method was utilized to calculate the 99% Confidence Limit. The methodology described in "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities: Addendum to Interim Final Guidance" dated January 28, 1993 was used to calculate the Cohen Confidence Limit. The

99% Upper Confidence Limit for the remaining parameters was calculated using the following equation:

$$CL = X_b + S_b \cdot t \cdot \sqrt{1 + \frac{1}{n}}$$

where: CL = Upper Confidence Limit (Upper and Lower for pH)

X_b = Mean (1)

S_b = Standard Deviation (2)

t = Student's t value at 0.01 significance (99% Confidence)

n = Number of background samples

APPENDIX F

Statistical Calculations

Winnebago Landfill
 Southern Unit
 Intrawell AGQS Statistics
 R22S

Raw Data

Parameter	Units	2ndQtr10	3rdQtr10	4thQtr10	1stQtr11	Normal Distribution	Nonparametric Upper Prediction Limit**
R22S							
Specific Conductance	umhos/cm	3,200	1,209	3,210	3,330	No	3,330

Notes:

*Shapiro-Wilk utilized to test for normality

**The maximum value was utilized as the nonparametric upper Prediction limit